

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION**

Donald J. Trump, Candidate for President
of the United States of America,

Plaintiff,

vs.

Case No. 2:20-cv-01785

The Wisconsin Elections Commission, and its
members, Ann S. Jacobs, Mark L. Thomsen,
Marge Bostelman, Dean Knudson, Robert F.
Spindell, Jr., in their official capacities, Scott
McDonell in his official capacity as the Dane
County Clerk, George L. Christenson in his
official capacity as the Milwaukee County Clerk,
Julietta Henry in her official capacity as the
Milwaukee Election Director, Claire Woodall-
Vogg in her official capacity as the Executive
Director of the Milwaukee Election Commission,
Mayor Tom Barrett, Jim Owczarski, Mayor Satya
Rhodes-Conway, Maribeth Witzel-Behl, Mayor
Cory Mason, Tara Coolidge, Mayor John
Antaramian, Matt Krauter, Mayor Eric Genrich,
Kris Teske, in their official Capacities; Douglas J.
La Follette, Wisconsin Secretary of State, in his
official capacity, and Tony Evers, Governor of
Wisconsin, in his Official capacity.

Defendants.

**PLAINTIFF’S UNOPPOSED SECOND MOTION TO ENLARGE THE TIME IN
WHICH PLAINTIFF AND HIS LEGAL COUNSEL MAY RESPOND TO PENDING
MOTIONS FOR IMPOSING ATTORNEY FEES AND COSTS INDIVIDUALLY,
JOINTLY AND SEVERALLY UPON PLAINTIFF AND EACH OF HIS COUNSEL**

Plaintiff Donald J. Trump (“Plaintiff”), by his undersigned attorneys, and pursuant to
Fed.R.Civ.P. 6 and Civil LR 7(b), submits this Unopposed Second Motion to enlarge the time for

response to pending motions for attorney fees and costs filed by various Defendants herein, and in support of this Motion states:

1. On December 12, 2020, this Court issued its Decision and Order (Dkt No. 134) and Judgment in a Civil Case (Dkt No. 135) dismissing this action with prejudice.

2. On March 31, 2021, April 2, 2021 and April 8, 2021 Defendant Governor Evers, Defendants Cory Mason, Tara Coolidge, John Antaramian, Matt Krauter, Eric Genrich and Kris Teske, and Defendants George Christenson and Julietta Henry, respectively, filed Motions seeking attorney fees and costs (collectively, the “Fees and Costs Motions”).

3. Pursuant to this Court’s Text Order (Dkt No. 159) of April 12, 2021, granting Plaintiff an extension to respond, Plaintiff’s responses to the Fees and Costs Motions are presently due Thursday, June 10, 2021, which time has not expired.

4. Due to a variety of factors including unforeseen filings and responsibilities for Plaintiff’s counsel in other matters Plaintiff reasonably requires an additional enlargement of the time in which to respond.

5. On Tuesday, May 18, 2021, counsel for Plaintiff contacted Mr. Jeffrey Mandel, counsel for Governor Evers, and Mr. Andrew Jones, counsel for the Milwaukee County Defendants, concerning this second motion for additional enlargement. On May 19, 2021, Mr. Mandel responded that counsel for all Defendants filing Fees and Costs Motions (including counsel for the Cities of Racine, Kenosha and Green Bay) and their counsel do not object to Plaintiff and his counsel receiving an additional enlargement of time to and including Monday, July 12, 2021, for Plaintiff and his attorneys to respond to the Fees and Costs Motions.

6. Based on the foregoing, Plaintiff's second motion for additional enlargement of time to respond is reasonable, will not prejudice any party, is filed in good faith and is not made to unduly delay the proceedings in this matter.

7. By filing this motion to enlarge the time in which he and his counsel may respond to the Fees and Costs Motions, neither Plaintiff Donald J. Trump nor his legal counsel concede that the Fees and Costs Motions, or any of them, were timely filed or merited, and all defenses thereto are hereby intended to be preserved.

WHEREFORE, Plaintiff Donald J. Trump, and his legal counsel, respectfully request the Court GRANT this second motion for additional enlargement of time, and ORDER that the time in which Plaintiff and his legal counsel may respond to the Fees and Costs Motions is enlarged to include Monday, July 12, 2021, and for all other just and proper relief.

Respectfully Submitted,

KROGER, GARDIS & REGAS, LLP

/s/ William Bock, III

William Bock III, Indiana Attorney No. 14777-49

James A. Knauer, Indiana Attorney No. 5436-49

Kevin D. Koons, Indiana Attorney No. 27915-49

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CERTIFICATE OF SERVICE

A copy of the foregoing document was served upon all parties' counsel of record via this Court's CM/ECF service on this 21 day of May, 2021.

/s/ William Bock, III

William Bock, III